

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: THOMAS A. JACOBSON JOYE L.  
JACOBSON  
Debtor(s) CHAPTER 13  
CHARLES J. DEHART, III  
CHAPTER 13 TRUSTEE  
Movant CASE NO: 1-20-00436-HWV  
vs.  
THOMAS A. JACOBSON JOYE L.  
JACOBSON  
Respondent(s)

**TRUSTEE'S MOTION TO DISMISS CASE**

AND NOW, on September 14, 2020, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, by and through his attorney James K. Jones, Esquire, and respectfully represents the following:

1. A Plan was filed on May 15, 2020.
2. A hearing was held and an Order was entered on July 8, 2020 directing that an amended plan be filed within thirty (30) days.
3. As of the date of this Motion, an amended plan has not been filed.
4. The delay in filing a confirmable plan in this case is prejudicial to creditors.

WHEREFORE, your Trustee respectfully requests your Honorable Court dismiss the case upon the basis that Debtors have failed to propose a confirmable plan.

Respectfully submitted,

s/ James K. Jones, Esq.  
Id: 39031  
Attorney for Trustee  
Charles J. DeHart, III  
Standing Chapter 13 Trustee  
Ste. A, 8125 Adams Drive  
Hummelstown, PA 17036  
Ph. 717-566-6097  
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**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: THOMAS A. JACOBSON  
JOYE L. JACOBSON

CHAPTER 13

**Debtor(s)**

CHARLES J. DEHART, III  
CHAPTER 13 TRUSTEE  
Movant

CASE NO: 1-20-00436-HWV

## NOTICE

NOTICE IS HEREBY GIVEN that Charles J. DeHart, III, Standing Chapter 13 Trustee for the Middle District of Pennsylvania has filed a Motion to Dismiss for failure to file a confirmable Chapter 13 Plan.

YOU ARE HEREBY NOTICED that a hearing has been scheduled on this matter for:

Any objection or response filed must be filed with the Clerk, U.S. Bankruptcy Court and served on the Chapter 13 Trustee.

Charles J. DeHart, III, Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
Phone: (717) 566-6097  
Email: dehartstaff@pAMD13trustee.com

Dated: September 14, 2020

UNITED STATES BANKRUPTCY COURT  
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JOYE L. JACOBSON

Debtor(s)

CHARLES J. DEHART, III  
CHAPTER 13 TRUSTEE  
Movant

CHAPTER 13

THOMAS A. JACOBSON  
JOYE L. JACOBSON

CASE NO: 1-20-00436-HWV

Respondent(s)

**CERTIFICATE OF SERVICE**

I certify that I am more than 18 years of age and that on September 14, 2020, I served a copy of this Motion to Dismiss, Notice and Proposed Order on the following parties by 1<sup>st</sup> Class mail, unless served electronically.

E. HALEY ROHRBAUGH  
CGA LAW FIRM, P.C.  
135 NORTH GEORGE ST  
YORK, PA 17401-

Served electronically

United States Trustee  
228 Walnut Street  
Suite 1190  
Harrisburg, PA 17101

Served electronically

THOMAS A. JACOBSON  
1795 ALPINE ROAD  
DOVER, PA 17315

Served by 1<sup>st</sup> Class Mail

I certify under penalty of perjury that the foregoing is true and correct.

Date: September 14, 2020

Respectfully,  
Vickie Williams  
for Charles J. DeHart, III, Trustee  
Suite A, 8125 Adams Dr.  
Hummelstown, PA 17036  
Phone: (717) 566-6097  
eMail: [dehartstaff@pamd13trustee.com](mailto:dehartstaff@pamd13trustee.com)

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Debtor(s)	CHAPTER 13
CHARLES J. DEHART, III	
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**ORDER DISMISSING CASE**

Upon consideration of the Trustee's Motion to Dismiss, it is hereby Ordered that the above-captioned bankruptcy be and hereby is dismissed.